

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

*In re C. R. Bard, Inc.*  
*Pelvic System Products Liability Litigation*  
*MDL No. 2187*

Civil Action No. 2:15-cv-05921

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**SHORT FORM COMPLAINT**

Come now the Plaintiff(s) named below, and for their Complaint against the Defendants named below, incorporate The Master Complaint in MDL No. 2187 by reference. Plaintiff(s) further show the court as follows:

1. Female Plaintiff

Lena Mae Crain

2. Plaintiff Husband

Theron Crain

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator)

N/A

4. State of Residence

Alabama

5. District Court and Division in which action is to be filed upon transfer from the MDL.

United States District Court for the District of New Jersey

6. Defendants (Check Defendants against whom Complaint is made):



A. C.R. Bard, Inc. ("Bard")



B. Sofradim Production SAS ("Sofradim")



C. Tissue Science Laboratories Limited ("TSL")

- ☐ D. Ethicon, Inc.
- ☐ E. Johnson & Johnson
- ☐ F. American Medical Systems, Inc. ("AMS")
- ☐ G. Boston Scientific Corporation
- ☐ H. Mentor Worldwide LLC
- ☐ I. Coloplast Corp.
- ☐ J. Cook Incorporated
- ☐ K. Cook Biotech, Inc.
- ☐ L. Cook Medical, Inc.
- ☐ M. Desarrollo e Investigación Médica Aragonesa S.L. ("DIMA")
- ☐ N. Neomedic International S.L.
- ☐ O. Neomedic Inc.
- ☐ P. Specialties Remeex International, S.L.

7. Basis of Jurisdiction

- ☒ Diversity of Citizenship

8.

a. Paragraphs in Master Complaint upon which venue and jurisdiction lie:

Paragraphs 2-8

b. Other allegations of jurisdiction and venue

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9. Defendants' products implanted in Plaintiff (Check products implanted in Plaintiff)

- ☐ A. The Align Urethral Support System;
- ☒ B. The Align TO Urethral Support System;
- ☐ C. The Avaulta Anterior BioSynthetic Support System;
- ☐ D. The Avaulta Posterior BioSynthetic Support System;

- ☐ E. The Avaulta Plus Anterior Support System;
- ☐ F. The Avaulta Plus Posterior BioSynthetic Support System;
- ☐ G. The Avaulta Solo Anterior Synthetic Support System;
- ☐ H. The Avaulta Solo Posterior Synthetic Support System;
- ☐ I. The InnerLace BioUrethral Support System;
- ☐ J. The Pelvicol Acellular Collagen Matrix;
- ☐ K. The PelviLace BioUrethral Support System;
- ☐ L. The PelviLace TO Trans-obturator BioUrethral Support System;
- ☒ M. The PelviSoft Acellular Collagen BioMesh; (x2)
- ☐ N. The Pelvitex Polypropylene Mesh;
- ☐ O. The Uretex SUP Purbourethral Sling;
- ☐ P. The Uretex TO Trans-obturator Urethral Support System;
- ☐ Q. The Uretex TO2 Trans-obturator Urethral Support System; and
- ☐ R. The Uretex TO3 Trans-obturator Urethral Support System.
- ☐ S. Other

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10. Defendants' Products about which Plaintiff is making a claim. (Check applicable products)

- ☐ A. The Align Urethral Support System;
- ☒ B. The Align TO Urethral Support System;
- ☐ C. The Avaulta Anterior BioSynthetic Support System;
- ☐ D. The Avaulta Posterior BioSynthetic Support System;
- ☐ E. The Avaulta Plus Anterior Support System;
- ☐ F. The Avaulta Plus Posterior BioSynthetic Support System;
- ☐ G. The Avaulta Solo Anterior Synthetic Support System;

- ☐ H. The Avaulta Solo Posterior Synthetic Support System;
  - ☐ I. The InnerLace BioUrethral Support System;
  - ☐ J. The Pelvicol Acellular Collagen Matrix;
  - ☐ K. The PelviLace BioUrethral Support System;
  - ☐ L. The PelviLace TO Trans-obturator BioUrethral Support System;
  - ☒ M. The PelviSoft Acellular Collagen BioMesh; (x2)
  - ☐ N. The Pelvitex Polypropylene Mesh;
  - ☐ O. The Uretex SUP Purbourethral Sling;
  - ☐ P. The Uretex TO Trans-obturator Urethral Support System;
  - ☐ Q. The Uretex TO2 Trans-obturator Urethral Support System; and
  - ☐ R. The Uretex TO3 Trans-obturator Urethral Support System.
  - ☐ S. Other
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11. Date of Implantation as to Each Product

August 10, 2010

12. Hospital(s) where Plaintiff was implanted (including City and State)

Grandview Medical Center, Jasper, TN

13. Implanting Surgeon(s)

Vonda R. Ware, MD

14. Counts in the Master Complaint brought by Plaintiff(s)

- ☒ Count I
- ☒ Count II
- ☒ Count III
- ☒ Count IV
- ☒ Count V

- ☒ Count VI
- ☒ Count VII (by the Husband)
- ☒ Count VIII
- ☒ Other Count IX- Consumer Protection Violation (please state the facts supporting this Count in the space, immediately below)
- ☐ Other \_\_\_\_\_ (please state the facts supporting this Count in the space, immediately below)

Count IX is based on the New Jersey Consumer Fraud Act (N.J.S.A. 56:8-1 *et seq.*)

Dated: May 7, 2015

**BARON & BUDD, P.C.**

Address and bar information:

/s/ Stephen Blackburn

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